



Land and Chemicals Division

Type of Document:

Information Request

7001 0320 0006 1559 2357

Facility Name:

Joslyn Corporation (now MacLean Power Systems-Joslyn)

Facility Location:

9200 West Fullerton Avenue (Facility)

11411 West Addison Street (Mailing)

Facility City:

Franklin Park

Facility State:

Illinois

Facility ZIP Code:

60131

U.S. EPA ID Number:

ILD077054708

Assigned Staff

Bradley R. Grams	(LCD/RCRA)	Phone:	312/886-7747
Stephen Thorn (Detail)	(ORC)	Phone:	312/353-9715

Name	Signature	Date
Author	Bradley R. Grams	2/20/2008
Section Chief Initial Review	Mary S. Setnicar	2/20/08
ORC Attorney	Stephen Thorn (Detail)	2/21/08
ORC Section Chief	Not Required	N/A
Section Chief	Mary S. Setnicar	2/25/08
Branch Chief	Willie H. Harris	N/A
Division Director	Margaret M. Guerriero	N/A
Regional Administrator	Mary A. Gade	N/A

Directions/Request for Clerical Support:

After the Section Chief/Branch Chief/Division Director/Regional Administrator signs this sheet and original letter:

Date stamp the cover letter;

Make three copies of the contents of this folder:

- One copy for the assigned staff;
- One copy for the section file; and
- One copy for the official file.

Make any additional copies for cc's or bcc's

cc's:

bcc's:

Mail the original certified mail and distribute office copies and cc's and bcc's.

Once the certified mail receipt is returned:

File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room;

E-mail staff the date that the letter was received by facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

10 5 MAR 2008

REPLY TO THE ATTENTION OF:

LR-8J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7001 0320 0006 1559 2357

Bob Sroka
EHS Coordinator
MacLean Power Systems
11411 West Addison Avenue
Franklin Park, Illinois 60131

Re: Request for Information
Joslyn Corporation (previously operated by MacLean Power Systems)
9200 West Fullerton Avenue, Franklin Park, Illinois 60131
U.S. EPA ID No.: ILD 077 054 708

Dear Mr. Sroka:

On February 14, 2008, representatives of the United States Environmental Protection Agency (U.S. EPA) inspected a facility located at 3700 South Morgan Street in Chicago, Illinois, allegedly related to MacLean Power Systems (MacLean or "you"). The purpose of the inspection was to evaluate MacLean's compliance with the Standards Applicable to Generators of Hazardous Waste, the Standards Applicable to the Owners and Operators of Hazardous Waste Treatment, Storage and Disposal Facilities the Interim Status Standards for Owners and Operators of Hazardous Waste Treatment, Storage and Disposal Facilities and the Standards for Used Oil Generators set forth at 35 I.A.C. Parts 722, 724, 725 and 728 [40 C.F.R. Parts 262, 264, 265 and 268], respectively.

As a follow-up to the inspection of MacLean, U.S. EPA, by this letter, requests information from MacLean, under Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended, 42 U.S.C. §§ 6927 *et. seq.* Section 3007 of RCRA authorizes U.S. EPA to require MacLean to submit certain information relating to hazardous wastes.

This request requires MacLean to submit information relating to the generation, transportation, treatment, storage and disposal of acute hazardous, hazardous and unidentified solid wastes at the previous MacLean branch, formerly known as the Joslyn Corporation facility, located at 9200 West Fullerton Avenue, Franklin Park, Illinois, 60131. We are requiring this information to determine MacLean's compliance status with the above referenced hazardous waste regulatory standards.

The enclosure specifies the information MacLean must submit. MacLean must submit this information within **15 CALENDAR DAYS** of receiving this request to the U.S. EPA at the following address:

Bradley R. Grams
Compliance Section 1
RCRA Branch
Land and Chemicals Division
77 West Jackson Boulevard, LR-8J
Chicago, Illinois 60604

Please note the following:

1. MacLean may, under 40 C.F.R. Part 2, Subpart B, assert a business confidentiality claim covering all or part of the information in the manner described in 40 C.F.R. § 2.203(b). We will disclose the information covered by a business confidentiality claim only to the extent and by means of the procedures at 40 C.F.R. Part 2, Subpart B.

MacLean must make any request for confidentiality when you submit the information since any information not so identified may be made available to the public without further notice.

2. MacLean must submit all requested information under an authorized signature certifying that the information is true and complete to the best of the signatory's knowledge and belief.

Should MacLean find, at any time after submitting the requested information, that any portion of the submitted information is false, misleading or incomplete, MacLean should notify us.

3. Knowingly providing false information, in response to this request, may be actionable under 18 U.S.C. §§ 1001 and 1341. We may use the requested information in an administrative, civil or criminal action.
4. This request is not subject to the Paperwork Reduction Act, 44 U.S.C. §§ 3501 *et. seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative or civil action or investigation.
5. Failure to comply fully with this request for information may subject MacLean to an enforcement action under Section 3008(a) of RCRA, 42 U.S.C. § 6928.

MacLean should direct questions about this request for information to Mr. Grams, of my staff, at (312) 886-7747.

Sincerely,

A handwritten signature in cursive script, appearing to read "Mary S. Setnicar".

Mary S. Setnicar, Acting Chief
Compliance Section 1
RCRA Branch
Land and Chemicals Division

Enclosures

cc: Todd Marvel, IEPA

REQUEST FOR INFORMATION

Instructions:

You must respond separately to each of the questions or requests below. Precede each answer with the number of the question or request to which it corresponds. For each document produced in response to this Request for Information, indicate on the document, or in some other reasonable manner, the number of the question or request to which it responds.

Requests:

1. Does MacLean currently generate any waste at the site on 9200 West Fullerton Avenue, Franklin Park, Illinois 60131?
2. Does MacLean currently generate hazardous waste at the site on 9200 West Fullerton Avenue, Franklin Park, Illinois 60131?
3. Is MacLean currently the owner of the site on 9200 West Fullerton Avenue, Franklin Park, Illinois 60131?
4. Is MacLean currently the operator of the site on 9200 West Fullerton Avenue, Franklin Park, Illinois 60131?
5. Does MacLean currently have any association with the site at 9200 West Fullerton Avenue, Franklin Park, Illinois 60131?
6. When was the last occurrence in which MacLean had an association with the site at 9200 West Fullerton Avenue, Franklin Park, Illinois 60131?

If different dates apply to the times at which MacLean was owning, operating or associating with the site, please provide each date.

7. During the time(s) of MacLean ownership, operation or association with the site at 9200 West Fullerton Avenue, Franklin Park, Illinois 60131, was the facility managed in order to minimize hazardous waste spills (planned or unplanned), fires or explosions?
8. During the time(s) of MacLean ownership, operation or association with the site at 9200 West Fullerton Avenue, Franklin Park, Illinois 60131, were there any known incidents of hazardous waste spills (planned or unplanned), fires or explosions?
9. Does MacLean have any knowledge as to the previous owner or operator of the site at 9200 West Fullerton Avenue, Franklin Park, Illinois 60131? If so, please provide any and all such information.

10. Provide the following certification by a responsible corporate officer:

I certify under the penalty of law that I have examined and am familiar with the information submitted in responding to this information request for production of documents. Based on my review of all relevant documents and inquiring of those individuals immediately responsible for providing all relevant information and documents, I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Date

Signature of Corporate Officer



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

AUG 22 2008

REPLY TO THE ATTENTION OF:

LR-8J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7001 0320 0006 0184 7720

Bob Sroka
EHS Coordinator
MacLean Power Systems
11411 West Addison Avenue
Franklin Park, Illinois 60131

Re: MacLean Power Joslyn
9200 West Fullerton Avenue, Franklin Park, Illinois 60131
EPA I.D. No.: ILD 077 054 708

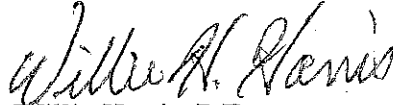
Dear Mr. Sroka:

On February 14, 2008, representatives of the U.S. Environmental Protection Agency inspected the MacLean Power Joslyn located in Chicago, Illinois. The purpose of the inspection was to evaluate MacLean Power Joslyn compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation, treatment and storage of hazardous waste. Please find enclosed a copy of the inspection report for your reference.

Based upon information available to EPA and the Illinois Environmental Pollution Agency (IEPA), our review of the inspection has not resulted in the detection of violations of any of the specific RCRA requirements under evaluation. This determination does not limit the applicability of the requirement's evaluated, other RCRA regulations, or regulations under other environmental statutes. EPA and the Illinois Environmental Pollution Agency will continue to evaluate MacLean Power Joslyn in the future.

If you have any questions or concerns regarding this matter, please contact
Timothy Carter, of my staff, at (312) 886-7613.

Sincerely,

A handwritten signature in cursive script, reading "Willie Harris".

Willie Harris, P.E.
Chief, RCRA Branch
Land and Chemicals Division

cc: Todd Marvel, IEPA



Land and Chemicals Division
RCRA Branch
Inspection Letter Signoff

Type of Document:

- ☐ Notice of Violation and Inspection Report/Checklist
☒ *In-Compliance Letters*
☐ No Violation Letter and Inspection Report/Checklist
☐ Letter of Acknowledgment
☐ Information Request
☐ Return to Compliance

Facility Name and Location and Id: **MacLean Power Systems**

9200 West Fullerton Avenue, Franklin Park, Illinois 60131 EPA I.D. No.: ILD 077 054 708
3700 South Morgan Street, Chicago, Illinois 60609 EPA I.D. No.: ILD 098 977 796

Assigned Staff:

Timothy Carter

Phone:

312-886-7613

Name	Signature	Date
Author	<i>[Signature]</i>	8/19/08
Regional Counsel		
Section Chief	<i>[Signature]</i>	8/21/08
Branch Chief	<i>Willie H. Harris</i>	8/22/08

Directions/Request for Clerical Support:

After the Section Chief signs this sheet and original letter:

1. Date stamp the cover letter;
2. Make four copies of the contents of this folder:
 - One copy for the assigned staff;
 - One copy for the section file; and
 - One copy for the official file; Note: original inspection report goes into file room.
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

DE-9J

12 SEP 2006

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ryan Richards
Plant Manager
Joslyn Manufacturing Company
9200 W Fullerton
Franklin Park, Illinois 60131

Re: Joslyn Manufacturing Company
EPA I.D. No.: ILD 077 054 708


Dear Mr. Richards:

On February 3, 2004, a representative of the United States Environmental Protection Agency (U.S. EPA) inspected Joslyn Manufacturing Company (Joslyn or you) located in Franklin Park, Illinois. In response to violations of 35 IAC 722.111 [40 CFR 262.11] and 35 IAC 739.122(c)(1) [40 CFR 279.22(c)(1)] identified during the inspection, the U.S. EPA issued a Notice of Violation to you on October 20, 2004. Subsequent to the U.S. EPA's Notice of Violation, you submitted additional information regarding the identified violations in correspondence dated October 26, 2004.

This letter is to inform you that U.S. EPA has reviewed the referenced responses, and does not plan additional enforcement action at this time. This letter does not limit the applicability of the requirements evaluated, or of other federal or state statutes or regulations. U.S. EPA and the Illinois Environmental Protection Agency will continue to evaluate Joslyn in the future.

If you have any questions or concerns regarding this matter, please contact Graciela Scambiaterra, of my staff, at (312) 353-5103.

Sincerely,

A handwritten signature in cursive script, reading "Lorna M. Jereza".

Lorna M. Jereza, Chief
Enforcement and Compliance Assurance Branch
Compliance Section 1

cc: Todd Marvel, Illinois Environmental Protection Agency



Waste, Pesticides and Toxics Division

Type of Document: ☐ Notice of Violation and Inspection Report
☐ No Violation Letter and Inspection Report
☒ Letter of Acknowledgment
☐ Information Request
☐ Pre-Filing and Opportunity to Confer
☐ State Notification of Enforcement Action

Facility Name : Joslyn Manufacturing Co

Facility Location: 9200 W Fullerton

City: Franklin Park State: Illinois

U.S. EPA ID# ILD 077 054 708

Assigned Staff Graciela Scambiaterra Phone: 3-5103

Name	Signature	Date
Author	<i>Graciela Scambiaterra</i>	<i>16 Sep 2006</i>
Regional Counsel		
Section Chief	<i>James M. Jay</i>	<i>9/11/06</i>
Branch Chief		

Directions/Request for Clerical Support:

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6. E-mail staff the date that the letter was received by facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

DE-9J

12 SEP 2006

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ryan Richards
Plant Manager
Joslyn Manufacturing Company
9200 W Fullerton
Franklin Park, Illinois 60131

Re: Joslyn Manufacturing Company
EPA I.D. No.: ILD 077 054 708

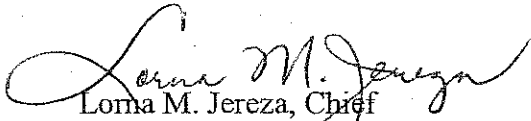
Dear Mr. Richards:

On February 3, 2004, a representative of the United States Environmental Protection Agency (U.S. EPA) inspected Joslyn Manufacturing Company (Joslyn or you) located in Franklin Park, Illinois. In response to violations of 35 IAC 722.111 [40 CFR 262.11] and 35 IAC 739.122(c)(1) [40 CFR 279.22(c)(1)] identified during the inspection, the U.S. EPA issued a Notice of Violation to you on October 20, 2004. Subsequent to the U.S. EPA's Notice of Violation, you submitted additional information regarding the identified violations in correspondence dated October 26, 2004.

This letter is to inform you that U.S. EPA has reviewed the referenced responses, and does not plan additional enforcement action at this time. This letter does not limit the applicability of the requirements evaluated, or of other federal or state statutes or regulations. U.S. EPA and the Illinois Environmental Protection Agency will continue to evaluate Joslyn in the future.

If you have any questions or concerns regarding this matter, please contact Graciela Scambiaterra, of my staff, at (312) 353-5103.

Sincerely,

A handwritten signature in cursive script, reading "Lorna M. Jereza".

Lorna M. Jereza, Chief
Enforcement and Compliance Assurance Branch
Compliance Section 1

cc: Todd Marvel, Illinois Environmental Protection Agency



Waste, Pesticides and Toxics Division

Type of Document: ☒ Notice of Violation and Inspection Report
☐ No Violation Letter and Inspection Report
☐ Letter of Acknowledgment
☐ Information Request
☐ Pre-Filing and Opportunity to Confer
☐ State Notification of Enforcement Action

Facility Name : Joslyn Manufacturing Co

Facility Location: 9200 W Fullerton

City: Franklin Park State: Illinois

U.S. EPA ID# ILD 077 054 708

Assigned Staff Graciela Scambiatterra Phone: 3-5103

Name	Signature	Date
Author	<i>Graciela Scambiatterra</i>	<i>10/20/04</i>
Regional Counsel	<i>attached e-mail message (J. Cha. ORC)</i>	<i>10/19/04</i>
Section Chief	<i>Laura M. Jorga</i>	<i>10/21/04</i>
Branch Chief		

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Once the certified mail receipt is returned:
5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room;
6. E-mail staff the date that the letter was received by facility.

James Cha/R5/USEPA/US

10/19/2004 11:09 AM

To

Subject Joslyn NOV

Hi, Graciela. See attached. Only a few very minor revisions to the report. The NOV was fine.

Please consider this email my official concurrence. Thanks.



Joslyn-InspReport.wpd



Joslyn-NOV.wpd

Lorna Jereza/R5/USEPA/US

10/13/2004 08:57 AM

To Illinois EPA

cc Graciela Scambiaterra/R5/USEPA/US, Harriet
Croke/R5/USEPA/US,

bcc

Subject Enforcement Action Communication (Joslyn Manufacturing
Company- NOV)

This is to inform you that on October 15, 2004, U.S. EPA will send by certified mail, the attached notice of violation (NOV) to the Joslyn Manufacturing Company facility (the facility). The alledged violations were found during U.S. EPA's February 3, 2004 compliance evaluation inspection of the facility.

Contact: Graciela Scambiaterra, (312) 353-5103



Joslyn-NOV.wpd



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

OCT 20 2004

DE-9J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Jason Kielp
Distributions Warehouse Manager
Joslyn Manufacturing Company
9200 W Fullerton
Franklin Park, Illinois 60131

Re: Notice of Violation
Joslyn Manufacturing Company
U.S. EPA I.D. No.: ILD 077 054 708

Dear Mr. Kielp:

On February 3, 2004, a representative of the United States Environmental Protection Agency (U.S. EPA) inspected Joslyn Manufacturing Company (Joslyn or the Facility) located in Franklin Park, Illinois. The purpose of the inspection was to evaluate Joslyn's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation, treatment and storage of hazardous waste. Please find enclosed a copy of the inspection report for your reference.

Based on information provided by Joslyn personnel, review of records, and personal observations made by the inspector at the time of the investigation, the U.S. EPA has determined that Joslyn is in violation of the following requirements:

1. 35 IAC 722.111 [40 C.F.R. 262.11], failure to complete a hazardous waste determination. At the time of the inspection, the Facility was only able to provide a Material Safety Data Sheet (MSDS) for the aqueous parts washer cleaning solution. This MSDS did not conclude that the parts washer waste is a RCRA non-hazardous waste. Therefore, Joslyn failed to conduct a complete hazardous waste determination as required by 35 IAC 722.111 [40 C.F.R. 262.11].

2. 35 IAC 739.122(c)(1)[40 C.F.R. 279.22(c)(1)], failure to mark used oil containers with the words, "Used Oil." At the time of the inspection, the Facility had several containers of used oil that were labeled, "Dirty Oil." Therefore, Joslyn failed to mark used oil containers with the words, "Used Oil" as required by 35 IAC 739.122(c)(1)[40 C.F.R. 279.22(c)(1)].

Under Section 3008(a) of the Resource Conservation and Recovery Act, 42 U.S.C. § 6928(a), U.S. EPA may issue an order assessing a civil penalty for any past or current violation and requiring compliance immediately or within a specified time period. Although this letter is not such an order, we request that you submit a written response to the violations cited above within 30 days of receipt of this letter. The response should document the actions, if any, which you have taken since the inspection to comply with the above requirements. You should submit your response to Graciela Scambiaterra, United States Environmental Protection Agency, Region 5, 77 West Jackson Boulevard, DE-9J, Chicago, Illinois 60604.

If you have any questions regarding this matter, please contact Graciela Scambiaterra, of my staff, at (312) 353-5103.

Sincerely,



Lorna Jereza, P.E., Chief
Compliance Section 1
Enforcement and Compliance Assurance Branch

Enclosure

cc: Todd Marvel, Illinois EPA

RCRA Compliance Evaluation Inspection Report
U.S. Environmental Protection Agency Region 5

Purpose: RCRA Compliance Evaluation Inspection

Facility: Joslyn Manufacturing Company
9200 W. Fullerton
Franklin Park, IL 60131

Facility ID Number: ILD 077 054 708

Date of Inspection: February 3, 2004

NAICS: 335931

U.S. EPA Inspectors: Graciela Scambiaterra
Environmental Scientist
(312) 353-5103

Facility Reps: Matthew Kirchner
Manufacturing Engineer
(773) 927-1420 ext.1265

Jason Kielp
Distributions Warehouse Manager
(773) 927-1420 ext.1244

Report Prepared by: Graciela Scambiaterra



Total Pages: 4

RCRA Compliance Evaluation Inspection

Introduction

I, Graciela Scambiaterra, Environmental Scientist, conducted a RCRA compliance evaluation inspection (CEI) at Joslyn Manufacturing Company (Joslyn) at 9200 W. Fullerton, Franklin Park, Illinois. Upon entering the Facility, I identified myself and provided my credentials to the Joslyn representatives. I interviewed Matthew Kirchner and Jason Kielp during the inspection. I also gave them a copy of the Small Business Resource Guide. They provided most of the information related to the records review portion of the hazardous waste management inspection and also accompanied us through all of the hazardous waste management site inspection of the Facility. Photos are attached.

History

Joslyn has been in business for approximately 100 years and was initially a cross-arm and pins manufacturing company for telephone poles. Eventually the company branched into poles and treatment of poles (woodtreating), and currently is a nuts and bolts manufacturer. Joslyn no longer is a woodtreater. The woodtreating facility behind the property has been closed for more than three decades, according to the facility representatives. Its last known woodtreating operation occurred in 1969.

Joslyn's current nuts and bolts facility is a 24-hr operation, 7 days a week. The processes that occur at this facility include the manufacturing of ceramic resistors. Powders are mixed in wet solutions and pressed into discs. These discs are baked for approximately 40 hours in ovens. The discs are then grinded. The process continues with layering and metalizing. The discs are then electrically tested and a fiberglass coating is then woven onto the discs with an epoxy coating as well. They are then returned to the ovens for curing of the epoxy coating. Afterwards, a rubber molding is also placed on the discs and cured. The final step includes assembly of the molded unit to the final package unit.

Records Review

Waste Streams/Waste Determinations:

The Facility generates an aqueous parts washer waste. Approximately 80 gallons are manifested as non-hazardous waste per month. The facility produced an Material Safety Data Sheet (MSDS) for the cleaning solution used in the parts washer (AquaWorks MM Dip Cleaning Solution). According to the MSDS, the cleaning solution is considered to carry a corrosive (D002) waste code when disposed as is from the supplier. I asked the Joslyn representative if they had an analytical report to show that the parts washer waste no longer was either corrosive, flammable, or had any other hazardous constituents to make it a RCRA hazardous waste. They did not have anything available at the time of the inspection.

Annual Reports

The facility does not submit annual reports to the Illinois EPA. The facility appears to be a small quantity generator.

Manifests

The manifests for the aqueous parts washer waste were reviewed. The waste is manifested as a non-hazardous waste and sent to Safety-Kleen in Dolton, Illinois.

Training Program

The Facility conducts OSHA, Hazmat, and contingency training on a monthly basis.

Facility Inspection

The inspection began at the powder process area. Here, raw material/powder is in drums. Then, a block is produced in the block press area. Here, a zinc-oxide powder waste is produced (photo 1). The next area we looked at was the kiln area. The blocks that were produced are baked here in ovens.

The next area we looked at was the grinding area. Here, zinc-oxide waste from grinding area was observed (photo 2). We then looked at the metallizing and electrotesting areas. Here, any blocks that don't pass their criteria are discarded in the zinc waste hopper.

We next toured the fiberglass wrapping area. Here, the baked blocks are wrapped in fiberglass and dipped in epoxy simultaneously. This area is where the Safety-Kleen parts washer is kept (photos 3-4). The parts washer is used to clean parts, and residue epoxy from trays could also be placed in the parts washer. The blocks are then baked in the oven once again.

We then looked at the molding area. Here, fiberglass stacks are molded with rubber parts. The next area we toured was the assembly area. Here, the nut and bolt area are filled with a different epoxy and the final product is tested.

The walk-thru ended at the storage area. Here, there was a roll-off box of zinc-oxide waste destined to be landfilled (photos 5-6), empty drums and drums labeled "dirty oil" (photos 7-8), and more empty drums (photos 9-10). I explained to the Joslyn representatives that the used oil containers should be labeled "Used Oil."

Closing Conference

At this time, I held a closing conference with the Joslyn representatives. I thanked them for their time and briefly discussed some of my initial findings/discrepancies (i.e possible improper waste

February 3, 2004

determination on the parts washer waste, and used oil containers labeled as "dirty oil" instead of "used oil"). I explained to the Joslyn representatives that my initial findings were tentative and may not be all inclusive. I added that a review of the compliance status of the facility would be conducted back at the U.S. EPA office and they would be notified by our office in the near future.

This ended the RCRA CEI.